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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**In re: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Case No. 07-5944 SC

MDL No. 1917

This Document Relates to:

*Sears, Roebuck and Co. and Kmart Corp. v.
Technicolor SA, No. 3:13-cv-05262;*

**DECLARATION OF TIFFANY B.
GELOTT IN SUPPORT OF JOINT
DEFENSE REPLY IN SUPPORT OF
MOTION IN LIMINE #10: MOTION TO
EXCLUDE EVIDENCE OF ANY
ALLEGED CDT PRICE-FIXING
CONSPIRACY**

*Sears, Roebuck and Co. and Kmart Corp. v.
Chunghwa Picture Tubes, Ltd., No. 11-cv-
05514;*

Date: None set
Time: 10:00 a.m.
Place: Courtroom No. 1

Sharp Electronics Corp., et al. v. Hitachi, Ltd., et al., No. 13-cv-01173;

Hon. Samuel Conti

Sharp Electronics Corp. v. Koninklijke Philips Elecs., N.V., No. 13-cv-2776 SC;

1
2 *Target Corp. v. Chunghwa Picture Tubes, Ltd.,*
No. 11-cv-05514;

3 *Target Corp. v. Technicolor SA*, No. 13-cv-
4 05686.

1 I, Tiffany B. Gelott, hereby declare as follows:

2 1. I am an associate with the law firm of Baker Botts L.L.P., counsel for Defendants
3 Koninklijke Philips N.V. and Philips Electronics North America Corporation (collectively, the
4 “Philips Defendants”). I am a member of the bar of the District of Columbia and I am admitted to
5 practice before this Court *pro hac vice*. I submit this declaration in support of the Joint Defense
6 Reply in Support of the Motion in Limine #10: Motion to Exclude Evidence of Any Alleged CDT
7 Price-Fixing Conspiracy (the “Reply”). The information contained herein is based on my own
8 personal knowledge, and if called as a witness I could, and would, testify competently that the
9 matters set forth herein are true.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of the Expert Report of
11 Alan S. Frankel, dated April 15, 2014, regarding Sears and Kmart;

12 3. Attached hereto as Exhibit 2 is a true and correct copy of the Expert Report of
13 Alan S. Frankel, dated April 15, 2014, regarding Target;

14 4. Attached hereto as Exhibit 3 is an excerpt from a true and correct copy of
15 interrogatory responses from Sharp Electronics Corporation and Sharp Electronics Manufacturing
16 Company of America, Inc.’s First Supplemental Responses and Objections to Defendants Hitachi
17 Electronic Devices (USA), Inc. and Samsung SDI America, Inc.’s First Set of Interrogatories,
18 dated February 26, 2014 (“Sharp’s Interrogatory Responses”).

19 5. Attached hereto as Exhibit 4 is an excerpt from the Deposition of Jerry Hausman,
20 dated July 23, 2014.

21 6. Attached hereto as Exhibit 5 is an excerpt from a true and correct copy of the
22 Expert Report of Jerry Hausman, dated April 15, 2014.

23 7. Attached hereto as Exhibit 6 is a true and correct copy of SDI Amended Plea
24 Agreement (Case No. 3:11-cr-00162-WHA, ECF No. 26-2), dated May 12, 2011.

25 8. Attached hereto as Exhibit 7 is a true and correct copy of a certified translation of
26 a document produced by the Chunghwa Defendants with the bates number, CHU00028521E.

27 9. Attached hereto as Exhibit 8 is a true and correct copy of a certified translation of
28 a document produced by the Chunghwa Defendants with the bates number, CHU00028558E.

DECLARATION OF TIFFANY B. GELOTT IN SUPPORT OF JOINT DEFENSE REPLY IN SUPPORT OF
MOTION IN LIMINE #10: MOTION TO EXCLUDE EVIDENCE OF ANY ALLEGED CDT PRICE-FIXING
CONSPIRACY

10. Attached hereto as Exhibit 9 is a true and correct copy of a certified translation of a document produced by the Chunghwa Defendants with the bates number, CHU00031111E.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on March 6, 2015 in Washington, DC.

/s/ Tiffany B. Gelott
Tiffany B. Gelott